

# 1.300 WEST PLAINS- Litrols Division West Plains Plant

#### JOHN ASHCROFT

Governor

#### G. TRACY MEHAN, III

Director



Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

# MEMORANDUM

STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES



WASTE MANAGEMENT PROGRAM

DATE:

March 31, 1989

TO:

Sandra Carroll. Waste Management Program

RTK.

FROM:

Rick Roberts, Poplar Bluff Regional Office

SUBJECT:

RCRA Compliance Inspection Report

Attached is a Report on Inspection of the Eaton Corporation Controls Division, West Plains Plant and the completed check lists and CMEL. If you have any questions call me at 785-0832.

RLR/sw



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### STATE OF MISSOURI

## DEPARTMENT OF NATURAL RESOURCES

#### DIVISION OF ENVIRONMENTAL QUALITY

Poplar Bluff Regional Office P.O. Box 1420 948 Lester Street Poplar Bluff, MO 63901 314-785-0832

March 31, 1989

LOW PB89-002

Mr. J.L. Counts, Materials Supervisor Eaton Corporation. Controls Division West Plains Plant P.O. Box 170 West Plains. MO 65775

Dear Mr. Counts:

Enclosed is a report on inspection of the Eaton Corporation Controls Division, West Plains Plant, which was conducted on December 20, 1988. The inspection was made to determine the facility's compliance with the environmental laws of the State of Missouri and the federal U.S. Environmental Protection Agency applicable to the management of hazardous waste. The report is believed to be self-explanatory, however, if you have any questions, please call Rick L. Roberts at 314-785-0832.

The Department of Natural Resources strongly urges you to take necessary actions to comply with the recommendations contained in the report. These actions are recommended to return your facility to compliance with applicable state and federal laws and rules regulating management of hazardous waste. Staff of the Department of Natural Resources, Poplar Bluff Regional Office, will be conducting follow-up inspections to determine if your facility has come into compliance.

Sincerely,

dames A. Burris, P.E.

Regional Administrator

JAB/RLR/lo

cc: Mr. Dave L. Crews, Manager-Administration

Ms. Sandy Carroll, Waste Management Program V

REPORT ON INSPECTION

OF

EATON CORPORATION

CONTROLS DIVISION

WEST PLAINS PLANT

210 ALLEN STREET

P.O. BOX 170

WEST PLAINS, MISSOURI 65775

EPA I.D. #MODO55872204

MISSOURI I.D. #03119

#### INTRODUCTION

On December 20, 1988, Rick L. Roberts and Albert R. Wampler, representives of the Department of Natural Resources, conducted an inspection of the hazardous waste management practices and procedures of the Eaton Corporation, Controls Division, West Plains Plant, located in West Plains, Missouri. The purpose of the inspection was to determine the facility's compliance with the Missouri Hazardous Waste Management Law and Rules, and the federal Resource Conservation and Recovery Act (RCRA) subsequent ammendents to RCRA and the federal regulations promulgated thereunder and adopted by the Department.

The Eaton Corporation facility at West Plains, Missouri, is regulated as a federal small quantity generator (generating between 100 to 1000 kilograms in a month). Waste quantities generated as determined during this inspection total 630 kilograms in a given month or less. The West Plains Plant is a manufacturer of gas appliance control valves for the gas cooking range industry. The manufacturing process involves machining of metal parts which are subsequently cleaned through metal degreasing equipment. Waste generated from metal degreasing consists of waste trichloroethylene, (F 001), waste trichlorofluoromethane (F 001), and waste petroleum naptha (D 001). The facility also generates approximately 30 gallons of waste oil per The two F001 wastes are disposed under manifests by Van Waters and Rogers, Berkley, MO. The waste trichloroethylene is generated at approximately 100 gallons (549 kg) per month. The waste trichlorofluoromethane is generated at approximately 4.5 gallons (25 The waste petroleum naptha (D 001) is generated kg) per month. through the use of a Safety Kleen Corporation parts cleaning unit and the waste is managed through Safety Kleen Corporation. This waste is generated at 15 gallons (56 kg) per month. American Waste Reclamation of Houston, Missouri, collects and manages the facility's waste oil, which averages approximately 30 gallons per month.

#### UNSATISFACTORY FEATURES

- 1. There was no device in the hazardous waste operation area capable of summoning emergency assistance as required by 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(d)(4) referenced to 265.34.
- 2. The generator does not provide notification to the treatment facility with each off-site shipment of waste that the waste is restricted and requires treatment prior to land disposal as required by 40 CFR 268.7(a)(1).
- 3. The generator notification on file does not include the Safety Kleen waste petroleum naptha and the amount and frequency of generation.
- 4. The generator notification on file does not include the waste oil (hydraulic, etc.) generated at the plant and the amount and frequency of generation.

#### COMMENTS

The inspectors, Rick L. Roberts and Albert R. Wampler, entered the Eaton Corporation, Controls Division, West Plains Plant, presented identification and stated the purpose of their visit. They were directed to Mr. J.L. Counts, Material Supervisor and joined by Mr. David L. Crews, Manager-Administration, both representing Eaton Corporation. The inspection began with a review of the wastes generated. It was discovered that four wastes were being generated and shipped off-site for final disposition. Information on file with the Department did not include registration of the waste petroleum naptha and the waste oil generated by the facility.

A review of the company paper work and manifest records proceeded. The facility personnel training records and job descriptions were determined to be in compliance. The contingency plan was in order and had recently been updated. The manifest records indicated that off-site waste shipments of the F001 wastes were occurring approximately every six months. The quantity being accumulated prior to shipment did not exceed 6,000 kilograms (approximately 1,093 gallons or 20 drums). Since these wastes are transported greater than 200 miles for disposition, they may be accumulated on-site up to 270 days without a permit provided the quantity does not exceed 6000 kg and large quantity generator storage standards are met.

It was noted in reviewing the manifest records that the generator had

not provided proper written notification to the waste treatment facility that the FOO1 wastes were subject to the land disposal restriction as required by 40 CFR 268.7(1)(1).

The two year exemption for small quantity generators ended November 8, 1988 and the facility had made one shipment since that date without proper written notification accompanying the manifest to the treatment facility.

Next the inspectors proceeded on a facility tour with company personnel to the waste management and storage areas. Containers in the storage area had proper markings and labeling and were kept closed. The storage area provided proper waste containment as required by 10 CSR 5.262(2)(C)2.B.(III). It was noted that no device was located in the hazardous waste operation area capable of summoning emergency assistance. This was brought to the attention of Mr. Counts and Mr. Crews. Following the waste management area tour, we returned to Mr. Counts office and concluded the inspection by reviewing the deficiencies noted during the inspection.

#### RECOMMENDATIONS

- We recommend that an emergency alarm system be installed in the hazardous waste operation area capable of summoning emergency assistance. Installation to be completed within 15 days of receipt of this report.
- 2. We recommend the generator immediately notify their waste treatment facility that their FOO1 wastes are subject to land disposal restriction and a written notice be sent with each future shipment containing the information in 40 CFR 268.7(a)(1)(i)-(iv). Send a copy of the notice to the Poplar Bluff Regional Office by April 28, 1989.
- 3. We recommend the facility complete an updated notification form EPA 8700-12/MDNR HWG-1 listing the waste pertroleum naptha (D001) and the waste oil along with their amounts and frequency by April 28, 1989.

SUBMITTED BY:

Rick L. Roberts, P.E.

Rick L. Roberts

Environmental Engineer III

APPROVED BY:

James A. Burris, P.E.

Regional Administrator

RLR/JAB/sw

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# SMALL QUANTITY GENERATOR CHECKLIST

Name of Facility: Eaton ONTUPE Corpora	tion Date: 12/20/58
Address: West Plant Plant	2 / 2 2 2
213 ATTEN 54 West Plans, 1113	15226 Phone (417) 256-7191
Facility Requirements: J. L. Counts   Parall	
Title: flaut 1146. Superissi	Marcon EPA I.D. 4 MUDOS-872204
Traisporter? No	Adum, stratism
provide a brief description of the manufacturing pr	Ocess.
Manufactures gas control values	Tot Gas applances
List the hazardous wastes generated:	
Waste Amount/month	Kilogram/month I.D.# Disposition 204017
FOOT-1. Trichlomethy lear 100 gale	549kg/with Fool War Water of Mickeyson Greph.
Four - 2. Trichloro 8/ normallians 45 cals	25kg/mth Fool Van Waters - Nekoskon Chem.
159:/s	56 Kg/mth Cool Springsield
4. Waste Gil (Hultoulie) 30gals.	
5	63 Oks/weath
. MANIFESTS AND RECORDEEPING 10 CSR 25-5.262(2) AND 5.262(2)(8) AND (D) B.	PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND
Generator's MO and EPA I.D. Numbers	5.262(2)(C)1
Manifest document number (MO I.D. & Shipment #)	Waste packaged, marked and labeled per DOT during entire on-site storage
EPA Wasta I.D. codes	Date of accumulation marked
Generator's name, address, phone #	Placards available for use by transporters
All Transporters' names, phone 8's, HO and EPA I.D. 8's	STORAGE STANDARDS 10 CSR 25-5.262(2) - 40 CFR 262.34(c) AND (d)
Designated facility name, address, phone # and HO and EPA I.D. # (")	Storage does not exceed 180 days (270 days if transported > 200 miles)
Proper DOT Shipping Name, Hazard Class and I.D. S	Accumulated wastes in storage do not exceed 6,000 kg
Containers, Quantity and Unit Wt/Vol being shipped properly designated .	* Note: If waste in storage exceeds 1,000 kg then large quantity storage standards apply, except for accumulated time.
Proper certification including waste minimization	Emergency coordinator on premise or on call
No more than 10 days time between generator and facility signatures	Emergency coordinator's name and phone # posted near phone
Manifests returned within 35 days	Locations of extinguisher and spill control equipment posted near phone:
If not, exception generator report submitted within 45 days (	Telephone # of fire department postod near phone
Completed manifests and Summary Manifest Report and Cartification	Employees familiar with waste handling and emergency procedures ( )
Spills of reportable quantities reported to DNR	Facility maintained and operated to minimize the possibility of an emergency.
Waste reclaimed under a contractual agreement	Internal communication or slarm system
Generator maintains a copy of the contractual agreement on-site ( )	A device in the hazardous waste operation area capable of summoning emergency assistance
The state of the s	Fire control, spill control, and decontamination equipment available . WHIM
	Adequate weter supply for fire control equipment.
	Communication and emergency equipment tested and maintained (2/

	Adequate aisle space	ran in the contract of the con			
	Arrangements with local authorities.				
	Containers in good condition	.,			
	Containers kept closed in storage.				
	Containers storing incompatible waste/ from each other				
	Containers of ignitable waste stored	>50 ft from facility property lines			
	Weekly inspection of container storage	area			
	<ul> <li>b. Container marked identifying or c. Containers closed/compatible/go d. Quantities accumulated not exce hz. waste).</li> </ul>	than one year.  ontents and beginning data.			
D.	STORAGE TANKS 10 CSR 25-5.262(1) AND	40 CFR 262.34(d) NOT APPLICABLE			
	Uncovered tanks have 2 ft. freeboard				
	Continuously fed tanks equipped with				
		ect damage, corresion, leakage			
	Discharge control equipment and data present, inspected daily.	from monitoring equipment, where			
	Level of waste in tank inspected dail	<del>(</del> )			
	Tanks in compliance with buffer zone (NFPA) requirements				
	Ignitable or reactive wastes stored safety				
	All hazardous waste (may include resi	dues and sontaminated soils)			
	Written waste oil contract maintained Waste oil properly stored and transpo	orted			
	HAZARDOUS WASTE STOR	RAGE TANKS /7. /T.			
WASTE CONT	<u>[AINED</u>	VOLUME OF TANK			
ease mark boxes	s as shown	In compliance			
ease mark boxes	s as shown	In compliance In violation			
ease mark boxes	s as shown				
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	s as shown sture Lik L. Rhen T	In violation			
		In violation			

	FATON Corpstation 12/20/89 c.	1. The facility is not sending restricted waste to a land disposal
	WEST PLAINS, N/3 65775 Massouri 1.0.0: 03/19	facility for direct land disposal without treatment
	Title: Plant Matts. Supervisor  Status: Large Quantity Cenerator Small Quantity Cenerator Small Quantity Cenerator	2. The treatment facility has adequately tested its treatment residues using TCLP, or applied knowledge, or both to determine whether or not they meet the applicable treatment standards specified in 268.41 (268.7(b))
	Treatment/Storage Facility Land Disposel Facility Permitted	3. The facility has modified its waste analysis plan to include the additional tasting requirements of 268.7, referenced in 269.13 and 265.13.
CENER		
	Specify the wastes handled by the facility which are subject to the land disposal restrictions:  EPA Waste Code (FOO1)  Waste Description	4. a. If the waste treatment residues do not meet applicable treatment standards or prohibitions, and are sent to another treatment facility prior to land disposal, then the facility compiled with the generator notification requirement of 268.7(a). (268.7(b))
	. TRICHLURIETHILENE FUIL Som Dagressing	
	6. F.D.D. TRICHLORDELLI: RUFTHANS Francher masing	4. b. If the treatment residue does not require further treatment prior to land disposal, then the facility submitted to the LDF with each shipment of waste residue a certification that the waste is in compliance with applicable treatment standards. [268.7(b)]
	Are these wastes properly classified? Yes No	
	Which, if any, of the following exemptions or extensions apply to this	- Certifications properly worded
	Two-year national capacity extension of the effective date for solvent wastes generated by small quantity generators (268.30)	5. The facility's written operating record has been modified, and now includes the documentation required by 264,73(b)(3)(10)(11)(12) or 265.73(b)(3)(8)(9)(10)
	- Two-year statutory exemption for solvent wastes generated from RCRA corrective or CERCLA Section 104 and 106 response actions (266.30)	<ol> <li>If the facility has stored restricted wastes for greater than one year, then it can satisfactorily demonstrate that the storage has been for the purpose of accumulating an amount necessary to facilitate proper recovery, treatment or disposal (258.50)</li> </ol>
	- Two-year national capacity extension of the effective date for solvent-water mixtures, solvent-containing sludges, or solvent-containing soll (non-CERCLAMRORA corrective action)	w facilitable proper recovery, disablent or disposar visorities
	containing less than 1% total FOO1-FOC5 solvent constituent, (268.30)	<ol> <li>If the treatment facility is permitted, it has made the necessary minor modifications to its permit to allow it to treat restricted vestes not previously specified in the permit [270.42(0)].</li> </ol>
	- Other, specify (268.4, 268.5, 268.6, 268.31, 268.44)	
		LAND DISPOSAL FACILITY REQUIREMENTS
3.	Has the facility used dilution of a restricted waste as a substitute for adequate treatment to achieve compliance (266.3)?	1. The facility is not land disposing restricted wastes( )
4.	List facilities to which off-site shipments of restricted wastes have been sent and/or from which shipments have been received.	<ol> <li>The land disposal facility has records of notifications and certifications submitted by all applicable generators and storage and treatment facilities for each shipment of waste or waste treatment residue accepted for land disposal. [268.7(c)]</li></ol>
	b	<ol> <li>The LDF has modified its waste analysis plan in accordance with the additional requirement of 268.7, referenced in 264.13 and 265.13.</li> </ol>
ŒNE	RATOR REQUIREMENTS	<ol> <li>The LDF has adequately tested the wastes received using TCLP, applied knowledge, or both. (268.7(c))</li></ol>
1.	Cenerator has adequately tested his wastes using the TCLP, or applied knowledge, or both. [268.7(a)]	5. The facility's written operating record has been modified, and now includes the documentation required by 264.73(b)(3)(i0)(i3)(i4) or 265.73(b)(3)(i0)(i1)(i2)
2.	Cenerator has determined the appropriate treatment standards for his restricted wastes. {268.7 and Subpert 0}(/)	comons: Generate was unaware of the
3.	The generator is not sending restricted waste to a land disposal facility for direct land disposal without treatment()	land disposal Restriction regulations
4.	a. If restricted wastes require treatment prior to land disposal, then the generator has provided notification to the treatment facility with each off-site shipment, [268.7(a)].	Please mark bosses as shown ( In compliance and In violation
4,	b. If restricted wastes do not require treatment prior to land disposal, then the generator has provided a notification and certification to the LOF that the wastes meet all applicable treatment standards and prohibitions [268.7(a)]	Inspector's Signature Rick 1. Rhents
	- Certifications properly worded	TILL Flyingenta Flyinger III
<b>5.</b>	If the generator's restricted waste is subject to any exemptions or extensions, then the generator has sent notices with each shipment to the LDF stating the waste is exempt. 1268.7(a)1(N/l)	ottion Popular Bland Register 1957, com Latter (Aug. 1. 87)

ethylene trichloride. Stable, colorless, heavy, mobile liquid, chloroform-like odor. CHClCCl<sub>2</sub>, mw: 131.40, mp: -73°, bp: 87.1°, fp: -86.8°, d: 1.45560 @ 25°/4°, autoign. temp.: 788° F; vap. press: 100 mm @ 32°, vap. d: 4.53, flash p: none, lel = 12.5%, uel = 90%.

Acute tox data: Oral LD<sub>LO</sub> (human) = 857 mg/kg; 160 ppm for 83 min  $\longrightarrow$  human CNS effects; 110 ppm for 8 hrs  $\longrightarrow$  inhal human irr effects; oral LD<sub>50</sub> (rat) = 4920 mg/kg; inhal LC<sub>LO</sub> (rat) = 8000 ppm for 4 hrs; ip LD<sub>50</sub> (dog) = 1900 mg/kg; iv LD<sub>LO</sub> (dog) = 150 mg/kg. [3]

THR = HIGH via iv; MOD via ip, inhal, oral routes. An exper (S) carc. [3, 13] Inhal of high conc causes narcosis and anesthesia. A form of addiction has been observed in exposed workers. Prolonged inhal of mod conc causes headache and drowsiness. Fatalities following severe, acute exposure have been attributed to ventricular fibrillation resulting in cardiac failure. There is damage to liver and other organs from chronic exposure. Cases have been reported but are of questionable validity. Determination of the metabolites trichloracetic acid and trichloroethanol in urine reflects the absorption of trichloroethylene. A food additive permitted in food for human consumption. [109] A common air contaminant.

Fire Hazard: Low, when exposed to heat or slame. High conc of trichloroethylene vapor in high-temp. air can be made to burn mildly if plied with a strong slame. Though such a condition is difficult to produce, slames or arcs should not be used in closed equipment which contains any solvent residue or vapor. Can react violently with Al, Ba, N<sub>2</sub>O<sub>4</sub>, Li, Mg, liquid O<sub>2</sub>, O<sub>2</sub>, KOH, KNO<sub>3</sub>, Na, NaOH, Ti. [19]

Spont Heating: No.

Disaster Hazard: Dangerous; see chlorides.

TRICHLOROETHYL SILANE. C<sub>2</sub>H<sub>3</sub>SiCl<sub>3</sub>, mw: 163.5.

THR = Reacts violently with water. [19]

TRICHLOROFLUOROGERMANE. Colorless liquid. GeCl<sub>3</sub>F, mw: 197.97, mp: -49°, bp: 37.5°.

THR = See fluorides, germanium compounds and chlorides.

1,1,1-TRICHLOROFLUOROETHANE. C<sub>2</sub>H<sub>2</sub>Cl<sub>3</sub>F, mw: 151.4.

THR = No data. See fluorides. Violent reaction with Ba. [19]

TRICHLOROFLUOROMETHANE. See fluorotrichloromethane. TRICHLOROGERMANE. Syn: germanium chloroform. Colorless liquid. GeHCl<sub>3</sub>, mw: 179.98, mp: -71.0°, bp: 75.2°, d: 1.93 @ 0°C.

THR = See hydrochloric acid and germanium compounds.

TRICHLOROISOCYANURIC ACID. White crystals, chlorine odor, mod sol in water. (ClNCO), mw: 232.5, mp: 225°-230° (decomp).

Acute tox data: Oral LD<sub>so</sub> (rat) = 700-800 mg/kg.

THR = MOD-HIGH via oral route. Toxicity symptoms include emaciation, lethargy, weakness and delayed death. Autopsy shows inflammation of GI tract, liver discoloration and kidney hyperemia. A powerful oxidizer.

Disaster Hazard: Dangerous; when heated to decomp, emits chloride and carbon monoxide fumes.

1,1,1-TRICHLOROISOPROPYL ALCOHOL. Syns: isopral, 1,1,1-trichloro-2-propanol. Crystals, camphor-like odor, pungent taste, water-sol. C<sub>3</sub>H<sub>3</sub>Cl<sub>3</sub>O, mw: 163.4, mp: 50°, bp: 162°.

Acute tox data: Oral LD<sub>LO</sub> (rat) = 1000 mg/kg. [3] THR = MOD via oral route. See also chlorinated hydrocarbons, aliphatic.

Disaster Hazard: Dangerous; see chlorides.

TRICHLOROMELAMINE. Syn: TCM. White powder, slightly water-sol. C<sub>3</sub>H<sub>3</sub>Cl<sub>3</sub>N<sub>6</sub>, mw: 229.4, autoign. temp.: 320° F.

Acute tox data: Oral LD<sub>50</sub> (mice) = 490 mg/kg. [3] THR = HIGH via oral route.

Fire Hazard: Mod, in the pure state, when heated or ignited by spark or flame; reacts vigorously to evolve smoke and heat; reacts with acetone, NH<sub>3</sub>, aniline, diphenylamine, turpentine. [19] Vendor can supply directions for handling.

Disaster Hazard: Dangerous; when heated to decomp, emits highly toxic chloride and NO<sub>x</sub> fumes.

TRICHLOROMETHANE. See chloroform.

TRICHLOROMETHANE SULFENYL CHLORIDE. See perchloromethyl mercaptan.

TRICHLOROMETHYL CHLOROFORMATE. See diphosgene.

TRICHLOROMETHYL ETHER. A liquid of pungent odor. CHCl<sub>2</sub>OCH<sub>2</sub>Cl, mw: 149.42, bp: 130°-132°, d: 1.5066 @ 10°.

THR = HIGH irr to skin, eyes and mu mem and via oral, inhal routes. See also ethers.

Disaster Hazard: Dangerous; when heated to decomp, emits highly toxic fumes; will react with water or steam to produce toxic and corrosive fumes.

TRICHLOROMETHYL PERCHLORATE. Cl<sub>3</sub>CClO<sub>4</sub>, mw: 217.8.

THR = Detonates @ 40°.